

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE: BRUCE L. LEBITZ</b>	:	<b>CHAPTER 13</b>
<b>HEIDI L. LEBITZ</b>	:	
<b>DEBTORS</b>	:	<b>CASE NO. 1:21-bk-02417</b>
	:	
<b>SANTANDER CONSUMER USA INC.</b>	:	
<b>dba CHRYSLER CAPITAL</b>	:	
<b>MOVANT</b>	:	
	:	
<b>BRUCE L. LEBITZ</b>	:	
<b>HEIDI L. LEBITZ</b>	:	
<b>RESPONDENTS</b>	:	
	:	
<b>JACK N. ZAHAROPOULOS, TRUSTEE:</b>	:	

**DEBTORS' RESPONSE TO SANTANDER CONSUMER USA INC. dba CHRYSLER  
CAPITAL'S MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11  
U.S.C. 362 PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001**

1. Movant, Santander Consumer USA Inc. dba Chrysler Capital, filed its Motion For Relief From Stay On April 6, 2023.

2. Debtors acknowledge some auto loan payments are past due.

3. Debtors desire the opportunity to cure any post-petition arrears and keep their automobile.

4. Debtors request the Court deny Movant's Motion for Relief.

WHEREFORE, Debtors, Bruce L. Lebitz and Heidi L. Lebitz, prays the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed April 6, 2023 by Santander Consumer USA Inc. dba Chrysler Capital.

Dated: April 11, 2023

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